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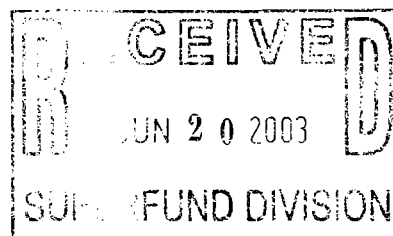
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June 13, 2003

U.S. Environmental Protection Agency
Attn: Larry L. Johnson, Esq.
Associate Regional Counsel
77 West Jackson Blvd. (C-140)
Chicago, Illinois 60604



Re: HIMCO Dump Site, Elkhart, Indiana
Easco Aluminum

Dear Attorney Johnson:

This office is in receipt of a General Notice of Liability dated May 29, 2003 concerning the HIMCO Dump Site.

By way of introduction, I am the Deputy General Counsel of Novar Inc. ("Novar"). Novar f/k/a Caradon Inc. purchased Easco, Inc. in August 1999 and as part of the acquisition took over the Elkhart facility that is now a part of our holdings known as Indalex Inc.

The Elkhart facility was originally known as Indiana Aluminum Extrusion Corp. ("Indiana Aluminum"). Indiana Aluminum was formed as a subsidiary of Easco Corporation in the latter part of 1976. Based upon the information available to us at this time, actual operations and production from this aluminum extrusion plant did not begin until the beginning of 1977. According to the *NPL Fact Sheets for Indiana* regarding the HIMCO Dump, January 2003 update, the HIMCO site closed in 1976. Thus, we believe that Easco Aluminum has been erroneously identified in the General Notice of Liability as a Potentially Responsible Party as it could not have contributed to or otherwise generated any possible contamination.

However, should your records indicate otherwise, please advise this office by providing the following information, or advise if such information is unavailable:

- information and/or documents pertaining to Indiana Aluminum's contribution to the site prior to its closure in 1976 (i.e., manifest)
- a preliminary volumetric ranking of the PRPs, including Indiana Aluminum's relative volume

Should you require further information or documentation in support of our position that Easco Aluminum has been listed in error as a PRP, please advise. Thank you for your time and assistance.

Sincerely,



Debra W. Keener
Vice President & Deputy General Counsel

Cc: ✓ Gwendolyn S. Massenburg
Remedial Project Manager
And
G. Marie Watts
Enforcement Specialist
U.S. Environmental Protection Agency
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